

**California Environmental Protection Agency (Cal/EPA)  
Environmental Justice (EJ) Action Plan**

**Proposed Working Definition for  
“Multi-Media Cumulative Impacts”**

**Developed for Cal/EPA EJ Action Plan Pilot Projects**

**February 4, 2005**

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*“Multi-media cumulative impacts” means the combined effects of emissions, discharges, and exposures on human health and the environment in a geographic area, taking into account sensitive populations.*

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The above statement is staff’s proposed draft working definition for “multi-media cumulative impacts” to be used in the EJ pilot projects. We welcome public comments and suggestions to the proposed definition.

Phase 1 of Cal/EPA’s EJ Action Plan requires the development of a common, reasonable, and objective working definition for “multi-media cumulative impacts” in an effort to explore practical applications of environmental strategies to effectively address environmental justice issues. The development of this working definition or “operational definition” will help provide the foundation for common understanding of the term “multi-media cumulative impacts” throughout the implementation of Cal/EPA’s EJ pilot projects.

Cal/EPA staff held public workshops to solicit comments, recommendations and suggestions to develop a working definition of “multi-media cumulative impacts” for use in implementing the EJ Action Plan. Public workshops were held on October 12, October 19, October 25, and November 8, 2004. Cal/EPA also held a public comment period (deadline January 3, 2005) to solicit additional input in the development of the working definition. Public comments were received from several different sectors, such as academia, community and environmental organizations, and business. All comments received were reviewed by Cal/EPA staff in the development of this working definition.

Staff’s proposed “multi-media cumulative impacts” working definition, developed for use in Cal/EPA’s EJ Action Plan pilot projects, is based on public input and the following references:

- Cal/EPA EJ Advisory Committee’s (CEJAC’s) September 30, 2003, Final Recommendations Report;
- California Environmental Quality Act (CEQA) Title 14, Article 20, section 15355 (available at [http://ceres.ca.gov/topic/env\\_law/ceqa/guidelines/art20.html](http://ceres.ca.gov/topic/env_law/ceqa/guidelines/art20.html));

- National Environmental Policy Act (NEPA), Code of Federal Regulations (CFR) Title 40, section 1508.7 (available at <http://ceq.eh.doe.gov/nepa/regs/ceq/1508.htm#1508.7>); and
- The work of other agencies and organizations working on cumulative impacts.

Based on our review and consideration of all input, staff has developed the proposed working definition for “multi-media cumulative impacts” for use in Cal/EPA’s EJ Action Plan. The proposed definition is intended to address multi-media cumulative impacts within the traditional health risk assessment paradigm and explore the feasibility of including other quantifiable factors that could influence the susceptibility of sensitive populations. Consideration of such factors in a cumulative impacts analysis would be limited to the extent that scientific data and science-based, peer-reviewed tools and guidelines are available to assess and quantify how these factors affect the communities’ sensitivity to emissions, discharges, exposures and health risks.

This includes human health risks from exposures to multiple pollutants from multiple sources that are emitted or discharged into air, water, and soil within a designated geographic area. The health risk assessments will consider sensitive populations, including children.

Some of the terms within the proposed definition will require further clarification, such as “emissions, discharges, and exposures.” At this time, we cannot confidently predict all the circumstances that will or will not constitute “emissions, discharges, and exposures.” Since the pilot projects have been proposed as a means of exploring the concepts of multi-media cumulative impacts, we plan to use the implementation, review, and analysis of these projects as to better define these key terms.

This working definition will be refined and modified as Cal/EPA’s knowledge improves in exploring multi-media cumulative impacts.